

Arasto Farsad, Esq. (SBN 273118)  
FARSAD LAW OFFICE, P.C.  
2905 Stender Way Suite 76  
Santa Clara, CA 95054  
Tel: 408-641-9966  
Fax: 408-866-7334  
Email: farsadlaw1@gmail.com

Attorney for Plaintiff:  
JANET ORTIZ

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JANET ORTIZ,

Plaintiff,

vs.

WELLS FARGO BANK, N.A.,

Defendant(s).

) **Case No. 3:16-cv-06555-RS**

)

) **JOINT STIPULATION AND ~~[PROPOSED]~~**  
) **ORDER TO STAY PROCEEDINGS FOR 60**  
) **DAYS**

)

) **Judge: Hon. Richard Seeborg**

)

) **Case Filed: 11/10/16**

) **Trial Date: TBD**

)

TO THE HONORABLE JUDGE RICHARD SEEBORG: Now Comes Plaintiff JANET  
ORTIZ, and Defendant, WELLS FARGO BANK, N.A., collectively, the "Parties", by and  
through their respective attorneys of record, and jointly stipulate and agree as follows:

**RECITALS**

1. WHEREAS, Plaintiff filed the instant Complaint on November 10, 2016;
2. WHEREAS, the Parties entered into a stipulation to extend the deadline for WELLS FARGO BANK, N.A. to respond to the Complaint. The stipulation was approved by this Court on January 10, 2017;

- 1 3. WHEREAS, the deadline for WELLS FARGO BANK N.A. to respond to Plaintiff's  
2 Complaint was extended to February 21, 2017;
- 3 4. WHEREAS, the Parties have been working on a potential settlement of the case and are  
4 fairly close to finalizing an agreement;
- 5 5. WHEREAS, the Parties participated in the ADR Unit's initial conference on January  
6 18, 2017, and advised Mr. Howard Herman of the settlement proposal / discussions.
- 7 6. WHEREAS, the initial Case Management Conference is currently scheduled for  
8 February 9, 2017;
- 9 7. WHEREAS, the Parties now wish to stay all proceedings in this matter for 60 days,  
10 including all hearings, briefings, appearances and all deadlines imposed by law or by  
11 the Court, to allow the Parties to hopefully finalize a settlement, without further  
12 litigation.
- 13 8. WHEREAS, the Parties stipulate and agree that the instant extension request is not  
14 requested for the purposes of delay and will not result in any prejudice to the Parties  
15 or to the Court.

16  
17  
18  
19 STIPULATION

- 20
- 21 9. WHEREFORE, the Parties hereby stipulate and agree that:
- 22 a. The case be stayed until March 19, 2017; and
- 23 b. The deadline for WELLS FARGO BANK, N.A. to respond to Plaintiff's
- 24 Complaint is March 19, 2017.
- 25
- 26

27 IT IS SO STIPULATED.

28

Dated: January 19, 2017

FARSAD LAW OFFICE, P.C.  
By: /s/ Arasto Farsad  
Arasto Farsad, Esq.  
Attorney for Plaintiff, JANET ORTIZ

1 Dated: January 19, 2017

Anglin Flewelling Rasmussen Campbell & Trytten  
LLP (AFRCT)

3 By: /s/ Dennis La  
4 Dennis La, Esq.

5 Attorneys for Defendant  
6 WELLS FARGO BANK, N.A.

7  
8 I hereby attest that I have on file all holographic signatures corresponding to any  
9 signatures indicated by a conformed signature (/S/) within this e-filed document.

10  
11 /s/ Arasto Farsad  
12 Arasto Farsad, Esq.

Dated: January 19, 2017

13  
14  
15 ~~PROPOSED~~ ORDER

16 Pursuant to the instant Stipulation of the Parties, and Good Cause appearing, the  
17 Court hereby orders as follows:

- 18  
19 1. The case is stayed until March 19, 2017;  
20 2. WELLS FARGO BANK N.A. shall respond to Plaintiff's Complaint on or  
21 before March 19, 2017;  
22 3. The Case Management Conference is continued to April 6, 2017 at 10:00 am

23 IT IS SO ORDERED.

24  
25 Dated: 1/20/17

26  
27   
28

Honorable Richard Seeborg

Judge of the United States District Court